

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>WAVERLY LICENSING LLC,</b>  Plaintiff,  v.  <b>AT&amp;T, INC.,</b>  Defendant.	Civil Action No.: 1:22-cv-00420-CFC  <b>TRIAL BY JURY DEMANDED</b>
<b>WAVERLY LICENSING LLC,</b>  Plaintiff,  v.  <b>GRANITE RIVER LABS INC.</b>  Defendant.	Civil Action No.: 1:22-cv-00422-CFC

**DECLARATION OF SON NGUYEN**

I, Son Nguyen, declare as follows:

1. I am the managing member and sole owner of Waverly Licensing LLC. I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. Plaintiff Waverly Licensing LLC's Amended Rule 7.1 Disclosure Statement submitted at D.I. 15 in C.A. No. 22-cv-420-CFC and D.I. 14 in C.A. No. 1:22-cv-00422-CFC complies with the Court's April 18, 2022, Standing Order Regarding Disclosure Statements Required by Federal Rule of Civil Procedure 7.1 and discloses the name of every owner, member,

and partner of Waverly Licensing LLC, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.

3. Waverly Licensing LLC does not have arrangements to receive from a person or entity that is not a party funding for some or all of the party's attorney fees and/or expenses to litigate this action on a non-recourse basis in exchange for (1) a financial interest that is contingent upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal loan, bank loan, or insurance. Apart from the statement provided, Waverly Licensing LLC therefore has no additional information responsive to the Court's April 18, 2022, Court's Standing Order Regarding Third-Party Litigation Funding Arrangements.

I declare under penalty of perjury that the foregoing is true and correct and that I have signed this declaration in Sugar Land, Texas on October 03, 2022.

*Son Nguyen*  
Son Nguyen  
Managing Member, Waverly Licensing LLC